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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KRYSTA TREMKO,

Plaintiff,

V.

CAPITAL BANK; CHEX SYSTEMS, INC.;
CLARITY SERVICES, INC.; DISCOVER
BANK; DISH NETWORK L.L.C.; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.; FACTOR TRUST, INC.; KOHL'S /
CAPONE; MASON COMPANIES INC.;
SYNCHRONY BANK; and TRANS UNION
LLC.

Defendants.

Case No.: 2:24-cv-00307-APG-MDC

**STIPULATION AND PROPOSED ORDER
FOR EXTENSION OF TIME TO FILE
JOINT PRETRIAL ORDER**

(First Request)

Pursuant to Fed. R. Civ. P. 6(b) and LR IA 6-1 and LR 26-3, Plaintiff Krysta Tremko and Defendant Synchrony Bank, by and through their undersigned counsel, respectfully stipulate to and request a fourteen (14) day enlargement of time to file the Joint Pretrial Order. In support thereof, the parties provide the following:

1. The Joint Pretrial Order is currently due to the Court on November 8, 2024 [ECF No. 77].

2. The parties acknowledge that this stipulation is being filed within 21 days of the applicable deadline and thus, requires a showing of good cause. LR 26-3.

1 3. Counsel for the parties have been in good-faith settlement discussions to try to
2 resolve the case and obviate the need for further litigation. Therefore, counsel for the parties have
3 conferred and agreed to jointly seek a modest extension of time to allow additional time for
4 continued settlement discussions.

5 4. This stipulation is made in good faith and not for purposes of undue delay. This is
6 the parties' first extension request, and no party will be prejudiced by the relief sought.

7 5. The parties therefore respectfully request this Court extend the time to file the Joint
8 Pretrial Order to, and including, November 22, 2024.

9 **IT IS SO STIPULATED.**

10 DATED this 5th day of November, 2024.

11 /s/ Brittni A. Tanenbaum
12 J Christopher Jorgensen, Esq.
13 Brittni A. Tanenbaum, Esq.
14 Lewis Roca Rothgerber Christie LLP
15 3993 Howard Hughes Parkway, Suite 600
16 Las Vegas, NV 89169

17 *Attorneys for Defendant Synchrony Bank*

18 /s/ Miles N. Clark
19 Miles N. Clark, Esq.
20 Law Offices of Miles N. Clark, LLC
21 5510 S. Fort Apache Rd., Suite 30
22 Las Vegas, NV 89148

23 *Attorneys for Plaintiff Krysta Tremko*

24 **IT IS SO ORDERED:**

25 _____
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: _____

3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169

LEWIS ROCA

1
2 **CERTIFICATE OF SERVICE**
3

4 I hereby certify that on this 5th day of November, 2024, I caused the foregoing
5 **STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME TO FILE**
6 **JOINT PRETRIAL ORDER** to be electronically filed with the Clerk of the Court by using
7 CM/ECF system, which will send a notice of electronic filing to counsel of record.
8

9 */s/ Lisa M. Noltie*
10 An Employee of Lewis Roca Rothgerber Christie

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